

Donald E. Watnick (DW 6019)  
LAW OFFICES OF DONALD WATNICK  
292 Madison Avenue, 17<sup>th</sup> Floor  
New York, New York 10017  
(212) 213-6886  
*Attorneys for Plaintiff*  
*Christian Augustin von Hassell*  
*a/k/a Agostino von Hassell*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
CHRISTIAN AUGUSTIN VON HASSELL a/k/a	:
AGOSTINO VON HASSELL,	:
	:
Plaintiff,	:
- against -	:
	:
	:
ALAIN SAINT-SAËNS and UNIVERSITY	:
PRESS OF THE SOUTH, INC.,	:
	:
Defendants.	:
	:
-----X	

07 Civ.3477 (LAK)

NOTICE OF MOTION FOR A  
DEFAULT JUDGMENT

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 55, upon the annexed Certificate of Default as to Defendant Alain Saint-Saens ("Saint-Saens") entered by the Clerk of this Court on September 5, 2007 and Declaration of Donald E. Watnick, Esq., and the exhibits annexed thereto, and the prior proceedings in this case, Plaintiff CHRISTIAN AUGUSTIN VON HASSELL a/k/a AGOSTINO VON HASSELL, will hereby move this Court, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 12D, as soon as counsel may be heard, for entry of an immediate Default Judgment against Defendant Alain Saint-Saens, and the scheduling of a hearing at which to assess the amount of damages and other relief to be awarded to Plaintiff from Defendant Saint-Saens.

Dated: New York, New York  
September 6, 2007

LAW OFFICES OF DONALD WATNICK

By: /s/ Donald E. Watnick

Donald E. Watnick (DW 6019)

292 Madison Avenue – 17<sup>th</sup> Floor

New York, New York 10017

(212) 213-6886

*Attorneys for Plaintiff*

*Christian Augustin von Hassell a/k/a Agostino  
von Hassel*

**Of Counsel:**

Edward F. Maluf (EM 6884)

BINGHAM McCUTCHEN LLP

399 Park Avenue

New York, New York 10022

(212) 705-7000